

1 DAVID L. ANDERSON (CABN 149604)
2 United States Attorney
3 SARA WINSLOW (DCBN 457643)
Chief, Civil Division
3 SAVITH IYENGAR (CABN 268342)
Assistant United States Attorney

4 450 Golden Gate Avenue, Box 36055
5 San Francisco, California 94102-3495
Telephone: (415) 436-7200
6 Fax: (415) 436-6748
savith.iyengar@usdoj.gov

7 Attorneys for Plaintiff UNITED STATES
8 DEPARTMENT OF STATE

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 OAKLAND DIVISION

12 UNITED STATES DEPARTMENT OF) CASE NO. 19-cv-04094-HSG
13 STATE,)
14 Plaintiff,)
15 v.)
16 BRUCE OWEN and ALEXANDRA OWEN,)
17 Defendants.)

)

18 Plaintiff United States Department of State (“Plaintiff”) and defendants Bruce Owen and
19 Alexandra Owen (“Defendants”), by and through their undersigned counsel, hereby STIPULATE and
20 respectfully REQUEST that the Court modify the schedule in this action as follows:

21 The parties previously brought to the Court’s attention a discovery dispute regarding Plaintiff’s
22 request, under Federal Rule of Civil Procedure 34, to inspect the property that is the subject of this
23 eviction action, located at 3400 Washington Street, San Francisco, California 94118. ECF No. 33. The
24 Court referred the parties’ discovery dispute to the Honorable Magistrate Judge Donna M. Ryu, ECF
25 No. 34, and Judge Ryu issued an order denying the parties’ stipulation and requiring the parties to
26 comply with the procedures set forth in the order and submit any joint letter regarding the dispute by
27 July 16, 2020. ECF No. 35. Judge Ryu also held that “[t]o the extent the parties seek to extend case
28 management deadlines, any such request must be submitted to the Honorable Haywood S. Gilliam, Jr.”

STIPULATION AND [PROPOSED] ORDER EXTENDING EXPERT DEADLINE
19-CV-04094 HSG

1 *Id.*

2 Following the order, on July 9, 2020, the parties requested — and this Court granted — an
 3 extension of the deadlines for the exchange of opening and rebuttal expert reports by two weeks to give
 4 the parties time “to continue to meet and confer in an attempt to resolve this dispute,” and given the
 5 “deadline of July 16, 2020 for any joint letter regarding the dispute.” ECF No. 37; ECF No. 39
 6 (extending joint letter deadline to July 17, 2020). On July 17, 2020, the parties filed their joint letter,
 7 ECF No. 40, and on July 22, 2020, Judge Ryu set a hearing on the joint letter for August 13, 2020. ECF
 8 No. 41.

9 The parties now seek to extend their deadline to exchange opening expert reports by one week —
 10 from July 24, 2020 until July 31, 2020 — to give the parties additional time to meet and confer in an
 11 attempt to resolve the dispute before their opening expert reports are due. Accordingly, the parties
 12 stipulate and respectfully request that the Court extend only their upcoming deadline for the exchange of
 13 opening expert reports by one week, as follows:

Event	Deadline
Exchange Opening Expert Reports	July 24, 2020 <u>July 31, 2020</u>
Exchange Rebuttal Expert Reports	August 7, 2020
Deadline to Complete ADR	August 20, 2020
Close of Expert and Fact Discovery	August 20, 2020
Dispositive Motion Hearing Deadline	Oct. 1, 2020, at 2:00 p.m.
Pretrial Conference	Oct. 27, 2020, at 3:00 p.m.
Jury Trial (5 Days)	Nov. 9, 2020, at 8:30 a.m.

21 SO STIPULATED.

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1 Respectfully submitted,

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3 DAVID L. ANDERSON
United States Attorney

4 Dated: July 23, 2020

5 By: /s/ Savith Iyengar
SAVITH IYENGAR
Assistant United States Attorney
6 Attorneys for Plaintiff

7 By: **/s/ Daniel Berko
DANIEL BERKO
8 Attorney for Defendants

9 ** Pursuant to Civ. L.R. 5-1(i)(3), the filer of the document
has obtained approval from this signatory.

PROPOSED ORDER

IT IS HEREBY ORDERED that the parties' schedule in this action is modified as follows:

Event	Deadline
Exchange Opening Expert Reports	July 31, 2020
Exchange Rebuttal Expert Reports	August 7, 2020
Deadline to Complete ADR	August 20, 2020
Close of Expert and Fact Discovery	August 20, 2020
Dispositive Motion Hearing Deadline	Oct. 1, 2020, at 2:00 p.m.
Pretrial Conference	Oct. 27, 2020, at 3:00 p.m.
Jury Trial (5 Days)	Nov. 9, 2020, at 8:30 a.m.

SO ORDERED.

Dated: 7/24/2020

Haywood S. Gill, Jr.
HON. HAYWOOD S. GILLIAM JR.
United States District Judge